

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK-----  
UNITED STATES OF AMERICA

-v-

JOHN TOWERS,

-----  
STIPULATION IN SUPPORT  
OF APPLICATION FOR  
7<sup>TH</sup> OR SUBSEQUENT  
ORDER OF CONTINUANCE AND  
11<sup>TH</sup> ORDER OF CONTINUANCE

Defendant.

24 Mag. 1534

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The United States of America and the defendant jointly request and agree that the time period from 2/19/2025 to 3/19/2025 be excluded from the computation of the period within which an information or indictment must be filed, pursuant to Title 18, United States Code, Section 3161(b) and (h)(7). The parties submit that there is good cause for an additional exclusion of time because the parties are exploring a possible disposition of this case prior to trial. The defendant, who is out on bail, is charged with a violation of Title 18, United States Code, Section 2251(a), which carries a mandatory minimum term of imprisonment of 15 years. Defense counsel has retained an expert to evaluate the defendant and prepare a report for defense counsel. The evaluator is still in the process of preparing the report. Defense counsel hopes to have the report within the next several weeks. Defense counsel is also in the process of reviewing various case materials that the Government has made available. Once the report from the expert is received, defense counsel expects to be able to expeditiously complete the submission to the Government.

By the following signatures we agree and consent to the exclusion of time noted above:

Defendant's Counsel

Date

Assistant U.S. Attorney

Date

Michael Burke, Esq.

Marcia S. Cohen

The defendant states that he has been fully advised by counsel of his rights guaranteed under (a) of the Sixth Amendment to the Constitution; (b) the Speedy Trial Act of 1974, as set forth in Title 18, United States Code, Sections 3161-74; and (c) the plans and rules of this Court adopted pursuant to that Act. The defendant understands that he/she has a right to be charged by indictment or information, and to have a trial before a judge or jury, within a specified time (excluding certain time periods) under the Constitution and Rules and Laws of the United States identified above. The defendant consents and agrees to the above request. Defense counsel has discussed this stipulation with the defendant and has the defendant's authorization to sign on his behalf.

Defendant  
JOHN TOWERS

Date

The joint application of the United States of America and the defendant having been heard at a proceeding on the date below, the time period from 2/19/2025 to 3/19/2025 is hereby

excluded in computing the time within which an indictment or information must be filed. The Court grants this continuance on the finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial, for the reasons set forth above. The Court further

Jmorders:

Dated: 2-19-2025  
White Plains, New York

**SO ORDERED**

Judith C. McCarthy  
Hon. Judith C. McCarthy  
United States Magistrate Judge